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Hearing Date: March 21<sup>st</sup>, 2019 at 10:00 am Objection Dateline: March 14, 2019 at 4:00 pm

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Attorneys for Natalie and Edward Parker

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, et al.

Chapter 11

Case No. 18-23538 (RDD) (Jointly Administered)

Debtor.

## NOTICE OF HEARING FOR RELIEF FROM THE AUTOMATIC STAY

PLEASE TAKE NOTICE that a hearing on the annexed motion (the "Motion"), of Natalie and Edward Parker (together, the "Parkers"), by and through their counsel, Tseitlin & Glas, for an order pursuant to Section 362(d)(1) of the Bankruptcy Code to lift the automatic stay so that their pending personal injury action in New Jersey State court against the Debtor can proceed to trial, will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 118, 300 Quarropas Street, White Plains, New York, 10601-4140 (the "Bankruptcy Court") on March 21<sup>st</sup>, 2019, at 10:00 a.m. (Eastern Time) (the "Hearing"), or as soon thereafter as counsel may be heard.

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PLEASE TAKE FURTHER NOTICE that any responses or objections (the "Objections)

to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure

and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the

Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys pro

hac vice, electronically in accordance with General Order M-399 (which can be found at

www.nsyb.uscourts.gov) and (b) by all other parties in interest, on a CD-Rom, in text searchable

portable document format (PDF) (with a hard copy delivered directly to Chambers), in

accordance with the customary practices of the Bankruptcy Court and General Order M-399, to

the extent applicable, and shall be served in accordance with the Amended Order Implementing

Certain Notice and Case Management Procedures, entered on November 1, 2018 (ECF No. 405),

so as to be filed and received no later than March 14, 2019, at 4:00 pm (Eastern Time) (the

"Objection Deadline")

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served

with respect to the Motion, the Debtors may, on or after the Objection Deadline, submit to the

Bankruptcy Court and order substantially in the form of the proposed order annexed to the

Motion, which order may be entered without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend the

Hearing, and failure to appear may result in relief being granted upon default.

Dated: January 30, 2019

New York, New York

TSEITLIN & GLAS, P.C.

By: /s/Eduardo J. Glas

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